

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

EDDIE BERNICE JOHNSON, et al.,

Plaintiff-Intervenors,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Consolidated Action: Lead Case]

**PLAINTIFFS' OPPOSED MOTION TO ENTER
PRETRIAL SCHEDULING ORDER**

Plaintiffs respectfully request that the Court enter the following pre-trial scheduling order. Plaintiffs and Defendants conferred regarding the relief requested in this motion and Defendants indicated that they are in agreement with all dates except the proposed 7-day deadline for amendment of complaints following the Court's ruling on the pending motion to dismiss. Doc. 848. Defendants indicated that they would file a separate motion to request a specific date for amendment of complaints, without respect to whether the Court has ruled on the pending motion to dismiss. This motion is therefore opposed in part and unopposed in part.

The proposed schedule is as follows:

7 days from the Court's ruling on State Defendants' First Amended Motion to Dismiss (Doc. 848): Deadline for all plaintiffs to file amended complaints.

March 21, 2025: Deadline to supplement initial disclosures and discovery responses; fact discovery re-opens for newly-disclosed individuals and documents.

March 31, 2025: Deadline to disclose supplemental expert reports, along with at least two dates the rebuttal expert is available for deposition; expert discovery reopens.

April 16th, 2025: Deadline to disclose rebuttal expert reports, along with at least two dates the rebuttal expert is available for deposition.

April 25, 2025: Close of discovery; parties confer regarding potential motions *in limine*; parties exchange potential joint exhibits.

May 2, 2025: Parties file pretrial materials, including Rule 26(a)(3) disclosures, motions *in limine*, and joint pretrial order; deliver expert witness report binders to chambers of each judge.

May 9, 2025: Parties file objections to Rule 26(a)(3) disclosures and responses to motions *in limine*.

May 14, 2025: Parties file pre-trial briefs and stipulated facts.

May 17, 2025: Plaintiffs serve their first week's witness list with witness order. Thereafter, all parties (including Defendants) will serve their witness order one week in advance.

May 20, 2025: Final pretrial conference and hearing on motions *in limine*.

May 21, 2025: First Day of Trial.

Trial will be held on the following days:

Wednesday May 21 through Saturday May 24

Tuesday May 27 through Saturday May 31

Wednesday June 4 through Saturday June 7

Additional trial days as ordered by the Court

Respectfully submitted;

For LULAC Plaintiffs:

/s/

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CERTIFICATE OF CONFERENCE

I certify that on March 6, 2025 and March 12, 2025, Plaintiffs conferred with State Defendants via email and video conference respectively regarding the relief requested in this motion. State Defendants indicated that they are in agreement with all dates except the 7-day deadline for amendment of complaints following the Court's ruling on the pending motion to dismiss. Doc. 848. State Defendants further indicated that they would file a separate motion to request a specific date for amendment of complaints. This motion is therefore opposed in part and unopposed in part.

/s/ Nina Perales

Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 12th day of March, 2025.

/s/ Nina Perales

Nina Perales